

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**

2 Stephen A. Broome (CA Bar No. 314605)
3 stephenbroome@quinnemanuel.com
4 Viola Trebicka (CA Bar No. 269526)
5 violatrebicka@quinnemanuel.com
6 Crystal Nix-Hines (Bar No. 326971)
7 crystalnixhines@quinnemanuel.com
8 Rachael L. McCracken (Bar No. 252660)
9 rachaelmccracken@quinneamanuel.com
Alyssa G. Olson (CA Bar No. 305705)
alyolson@quinnemanuel.com
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

10 Jomaire Crawford (admitted *pro hac vice*)
11 jomairecrawford@quinnemanuel.com
12 D. Seth Fortenberry (admitted *pro hac vice*)
13 sethfortenberry@quinnemanuel.com
14 51 Madison Avenue, 22nd Floor
15 New York, NY 10010
16 Telephone: (212) 849-7000
17 Facsimile: (212) 849-7100

Andrew H. Schapiro (admitted *pro hac vice*)
andrewschapiro@quinnemanuel.com
Teuta Fani (admitted *pro hac vice*)
teutafani@quinnemanuel.com
Joseph H. Margolies (admitted *pro hac vice*)
josephmargolies@quinnemanuel.com
191 N. Wacker Drive, Suite 2700
Chicago, IL 60606
Telephone: (312) 705-7400
Facsimile: (312) 705-7401

Xi ("Tracy") Gao (CA Bar No. 326266)
tracygao@quinnemanuel.com
Carl Spilly (admitted *pro hac vice*)
carlspilly@quinnemanuel.com
1300 I Street NW, Suite 900
Washington D.C., 20005
Telephone: (202) 538-8000
Facsimile: (202) 538-8100

16 *Counsel for Defendant Google LLC*

17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

19 CHASOM BROWN, *et al.*, individually and
20 on behalf of themselves and all others
21 similarly situated,

22 Plaintiffs,

23 v.

24 GOOGLE LLC,

25 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF CARL SPILLY IN
SUPPORT OF GOOGLE'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF GOOGLE'S LETTER
BRIEF RE: DAUBERT MOTION TO
EXCLUDE CERTAIN OPINIONS OF
PLAINTIFFS' EXPERT JOHNATHAN
HOCHMAN PURSUANT TO DKT. 988**

26 Judge: Hon. Yvonne Gonzalez Rogers

1 I, Carl Spilly, declare as follows:

2 1. I am an attorney with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for
 3 Defendant Google LLC (“Google”) in this action. I am making this declaration pursuant to Civil
 4 Local Rule 79-5(e)–(f) as an attorney for Google as the Designating Party, pursuant to Civil Local
 5 Rule 79-5(f)(3) in response to Dkt. 990.

6 2. Pursuant to the Court’s September 7, 2023 Order (Dkt. 988), Google submits a two-
 7 page Letter Brief re: Daubert Motion to Exclude Certain Opinions of Plaintiffs’ Expert Johnathan
 8 Hochman. Based on my review, there are compelling reasons to seal the following:

Document(s) to be Sealed	Basis for Sealing
Exhibit A: Second Supplemental Expert Report of Jonathan E. Hochman	The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s logs and internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2–3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.
Highlighted portions at pages: 2-19	

21 3. Google’s request is narrowly tailored in order to protect its confidential information.
 22 These redactions are limited in scope and volume. Because the proposed redactions are narrowly
 23 tailored and limited to portions containing Google’s highly confidential or confidential information,
 24 Google requests that the portions of the aforementioned documents be redacted from any public
 25 version of those documents.

26 4. Google does not seek to redact or file under seal any portions of Plaintiffs’ Expert
 27 Report not indicated in the table above.

1 I declare under penalty of perjury of the laws of the United States that the foregoing is true
2 and correct. Executed in Washington, D.C on September 20, 2023.
3
4

5 By /s/ Carl Spilly
6 Carly Spilly
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28